

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463
FIRST GENERAL COUNSEL'S REPORT

AUDIT REFERRAL: 08-02
DATE REFERRED: February 8, 2008
DATE ACTIVATED: February 26, 2008

STATUTE OF LIMITATIONS: 02/21/10 –
01/31/12

SOURCE:

INTERNALLY GENERATED

RESPONDENTS:

**Dallas County Republican Party and
Jonathan Neerman, in his official capacity as
treasurer**

RELEVANT STATUTES:

2 U.S.C. §§ 434(b)(2), (4) and (5)

INTERNAL REPORTS CHECKED:

**Audit Documents
Disclosure Reports**

FEDERAL AGENCIES CHECKED:

None

I. INTRODUCTION

This matter was generated by a Commission audit pursuant to 2 U.S.C. § 438(b) of the Dallas County Republican Party ("Committee") covering the period January 1, 2005 through December 31, 2006. The Audit Division submitted the Final Audit Report ("FAR") to the Commission on December 18, 2007. Attachment 1.¹ On February 8, 2008, the Audit Division referred Findings 1 and 5 to this Office for enforcement. The audit findings relate to the Committee's misstatement of financial activity and failure to disclose required information

¹ The FAR has been approved by the Commission.

1 regarding disbursements or disclosing inaccurate information regarding disbursements.⁷ The FAR
2 notes that the Committee filed amended disclosure reports correcting the problems cited in the audit
3 findings. Based on the information set forth in the FAR, we recommend that the Commission find
4 reason to believe that:

- 5 • The Committee misstated financial activity concerning receipts and disbursements
6 on its 2006 disclosure reports, in violation of 2 U.S.C. §§ 434(b)(2) and (4) (*See*
7 Finding 1, Attachment 1 at pp. 9-11).
 - 8 • The Committee failed to include required information on disbursements or disclosed
9 inaccurate information on disbursements in 2005 and 2006, in violation of 2 U.S.C.
10 § 434(b)(5) (*See* Finding 5, Attachment 1 at pp. 14-16).
- 11
12
13
14
15
16
17
18
19
20
-
-

10044261603

First General Counsel's Report

1

2

3

4

5

6

7

8

9

10

11

10044261604

1

2

3

III. RECOMMENDATIONS

4

1. Open a MUR.

5

6

7

2. Find reason to believe that Dallas County Republican Party and Jonathan Neerman, in his official capacity as treasurer, misstated receipts and disbursements in 2006, in violation of 2 U.S.C. §§ 434(b)(2), and (4).

8

9

10

11

3. Find reason to believe that Dallas County Republican Party and Jonathan Neerman, in his official capacity as treasurer, failed to include required information regarding disbursements or disclosed inaccurate information regarding disbursements in 2005 and 2006, in violation of 2 U.S.C. § 434(b)(5).

12

4. Approve the Factual and Legal Analysis.

13

14

15

6. Approve the attached Conciliation Agreement.

16

17

18

19

20

21

22

23

24

10044261605

7. Approve the appropriate letter.

Thomasenia P. Duncan
General Counsel

5-28-08
Date

BY: K. H. G. H.
Kathleen Guith
Acting Deputy Associate General Counsel

Susan L. Lebeaux
Susan L. Lebeaux
Assistant General Counsel

Delbert K. Rigsby
Delbert K. Rigsby
Attorney

10044261606